

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2023 FEB 22 PM 4:10
SEAL

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KHALAH BEARD,
ALEXAS DAVIS, and
JOAN ROBINSON aka "Jay,"

Defendants.

OFFICE OF THE CLERK

8:23CR39

INDICTMENT

18 U.S.C. § 1594(c)

18 U.S.C. § 1591(a)

18 U.S.C. § 2421(a)

18 U.S.C. § 2

The Grand Jury charges that

COUNT I

(Conspiracy to Engage in Sex Trafficking of a Minor)

1. Beginning on an unknown date, but from at least on or about November 2, 2022, and continuing through on or about November 16, 2022, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendants, KHALAH BEARD, ALEXAS DAVIS, JOAN ROBINSON aka "Jay," and others known and unknown to the Grand Jury, did unlawfully, willfully and knowingly conspire, combine, confederate and agree together and with each other, and with others known and unknown to the Grand Jury, to knowingly recruit, entice, harbor, transport, provide, maintain, and obtain a minor female identified as MINOR VICTIM 1, her name and date of birth fully known to the Grand Jury, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 1, and knowing and in reckless disregard that MINOR VICTIM 1 was under the age of 18 years old, and knowing and in reckless disregard that MINOR VICTIM 1 would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Section 1591(a).

WAYS, MANNER, AND MEANS OF THE CONSPIRACY

2. The purpose of the conspiracy was to obtain money and other items of value for members of the conspiracy.

3. Members of the conspiracy would and did use MINORS to facilitate the conspiracy.

4. Members of the conspiracy would and did use vehicles and public highways to drive the MINOR VICTIM to hotels, motels, and other locations for commercial sex acts, including in Omaha, Nebraska.

5. Members of the conspiracy obtained and paid for hotel and motel rooms for commercial sex acts involving the MINOR VICTIM.

6. Members of the conspiracy would and did require the MINOR VICTIM to pay a portion or all of the payments received for commercial sex acts to members of the conspiracy.

7. Members of the conspiracy did participate in sex acts with MINOR VICTIM and commercial sex buyers for financial gain.

In violation of Title 18, United States Code, Section 1594(c).

COUNT II

(Sex Trafficking of a Minor)

On or about November 12, 2022, through November 16, 2022, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, KHALAH BEARD, did knowingly recruit, entice, harbor, transport, provide, maintain, and obtain a minor female identified as MINOR VICTIM 1, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 1 and knowing and in reckless disregard that MINOR VICTIM 1 was

under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and 2.

COUNT III

(Transportation for Prostitution)

On or about November 12, 2022, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, JOAN ROBINSON aka “Jay,” did knowingly transport an individual in interstate commerce, from Wichita, Kansas, to Omaha, Nebraska, with the intent that the individual engage in prostitution, to wit: Khalah Beard, Alexas Davis, and Minor Female 1.

In violation of Title 18, United States Code, Sections 2421(a) and 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts I through III of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594(d).

2. Pursuant to 18 U.S.C. § 1594(d), upon conviction of an offense in violation of 18 U.S.C. § 1591, the defendants, KHALAH BEARD, ALEXAS DAVIS, and JOAN ROBINSON aka “Jay,” shall forfeit to the United States:

- a. any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense; and
- b. any property, real or personal, constituting or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendants KHALAH BEARD, ALEXAS DAVIS, JOAN ROBINSON aka "Jay," and ZEXCEE SMITH, up to the value of said property listed above as being subject to forfeiture.

Criminal forfeiture, in violation of Title 18, United States Code, Section 1594.

FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.


KELLI L. CERAOLO, MN #0398049
Assistant U.S. Attorney